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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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<i>In re:</i>	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Chapter 11
	:	Case No. 19-23649 (RDD)
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	

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**FIFTH MONTHLY FEE STATEMENT OF GILBERT LLP, FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC COMMITTEE OF  
GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS  
FOR THE PERIOD FEBRUARY 1, 2020 THROUGH FEBRUARY 29, 2020**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>February 1, 2020 through February 29, 2020</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$83,506.80 (80% of \$104,383.50)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$7,227.53 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this fifth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing February 1, 2020 through February 29, 2020 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$104,383.50 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$83,506.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$722.63. The blended hourly rate of paraprofessionals during the Application Period is \$255.37.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$7,227.53 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$7,227.53.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

5. Pursuant to the Reimbursement Order, Gilbert LLP has separately recorded services performed relating to allocation of value among the Debtors' creditors, and to the best of Gilbert LLP's knowledge, has not included time relating to intercreditor allocation in this Monthly Fee Statement.

#### **FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$83,506.80 (80% of \$104,383.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$7,227.53 (100%), for a total amount of \$90,734.33, for the Application Period.

Dated: April 22, 2020  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

*/s/ Kami E. Quinn*

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**  
**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A001	Asset Analysis & Recovery	90.2	\$32,793.50
A004	Case Administration	4.0	\$3,147.50
A006	Employment / Fee Applications	2.6	\$715.00
A007	Emergency Relief Fund	16.9	\$11,550.00
A009	Meetings / Communications with AHC & Creditors	19.2	\$18,539.00
A015	Non-Working Travel Time (Billed @ 50%)	21.9	\$12,470.00
A019	Plan of Reorganization / Disclosure Statement	26.7	\$25,168.50
		<b>181.5</b>	<b>\$104,383.50</b>

**Exhibit B**

**Summary of Compensation by Professional**

### SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims - 2019	\$1,500.00 \$750.00	16.0 10.0	\$24,000.00 \$7,500.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$950.00 \$475.00	17.2 8.0	\$16,340.00 \$3,800.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia - 2019	\$675.00	8.5	\$5,737.50
Monique Abrishami	Of Counsel / State of Florida – 2009 District of Columbia - 2019	\$640.00	7.3	\$4,672.00
Emily Grim	Associate / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$600.00 \$300.00	17.8 3.9	\$10,680.00 \$1,170.00
Daniel Wolf	Associate / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$600.00	2.2	\$1,320.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit – 2017	\$570.00	8.2	\$4,674.00
Benjamin Massarsky	Associate / State of New York – 2011 District of Columbia – 2012 U.S. District Court for the District of Columbia – 2012 State of Maryland - 2016	\$500.00	8.6	\$4,300.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia - 2017	\$380.00	7.0	\$2,660.00
Rachael Lyle	Staff Attorney / State of Alabama – 2017 District of Columbia - 2018	\$305.00	9.5	\$2,897.50
Christian Carey	Law Clerk – Joined firm in 2019	\$325.00	16.1	\$5,232.50
Alyssa Bonesteel	Paralegal – Joined firm in 2018	\$225.00	10.7	\$2,407.50

Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Katherine Johnson	Paralegal – Joined firm in 2018	\$225.00	18.0	\$4,050.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$225.00	9.9	\$2,227.50
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$275.00	2.6	\$715.00
<b>Totals</b>			<b>181.50</b>	<b>\$104,383.50</b>
<b>Attorney Blended Rate</b>		<b>\$722.63</b>		
<b>Paraprofessional Blended Rate</b>		<b>\$255.37</b>		

**Exhibit C**  
**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Business Meals	\$330.50
Contracted Professional Fees – Litigation Support Vendor	\$124.02
Lexis	\$20.87
Pacer	\$22.70
Westlaw	\$3,434.58
Travel – Lodging (Standard Room Rate)	\$1,680.21
Travel – Meals	\$593.96
Travel – Taxi Fare	\$24.69
Travel – Train Fare (Coach Fare)	\$996.00
	<b>\$7,227.53</b>

**Exhibit D**

**Time and Expense Detail**



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April 22, 2020

Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

Invoice Number: 11319536  
Client Number: 1599  
Tax ID: 52-2283869

**FOR PROFESSIONAL SERVICES RENDERED through February 29, 2020****Re: Ad Hoc Committee (Purdue)**

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	104,383.50	7,227.53	111,611.03
<b>Total</b>	<b>104,383.50</b>	<b>7,227.53</b>	<b>111,611.03</b>
	TOTAL FEES		\$ 104,383.50
	TOTAL EXPENSES		<u>\$ 7,227.53</u>
	<b>TOTAL FEES AND EXPENSES</b>		<b>\$ 111,611.03</b>

**FOR PROFESSIONAL SERVICES RENDERED through February 29, 2020****Purdue Bankruptcy****A001: Asset Analysis & Recovery**

Name	Date	Services	Hours	Amount
Hudson, J.	2/03/20	Communicate with M. Abrishami re completion of operations for policy analysis research.	.20	135.00
Hudson, J.	2/03/20	Formulate strategy for recovering assets.	.20	135.00
Massarsky, B.	2/03/20	Analyze notice provided to certain insurers re coverage determination.	1.00	500.00
Abrishami, M.	2/03/20	Communicate with J. Hudson re legal research re policy language.	.20	128.00
Hudson, J.	2/04/20	Communicate with S. Martinez re fleshing analysis for insurance review purposes.	.10	67.50
Martinez, S.	2/04/20	Review and revise policy index.	2.30	517.50
Massarsky, B.	2/04/20	Draft summary of certain course of dealing re coverage analysis.	1.50	750.00
Abrishami, M.	2/04/20	Review research memoranda and background materials re certain insurance policies.	.40	256.00
Bonesteel, A.	2/04/20	Research domicile information for all Debtors' entities.	2.30	517.50
Wolf, D.	2/05/20	Confer with KCIC re coverage chart.	.40	240.00
Martinez, S.	2/05/20	Continue revising policy index.	2.00	450.00
Massarsky, B.	2/05/20	Confer with KCIC re insurance policy coding.	.50	250.00
Abrishami, M.	2/05/20	Analyze impact of certain language in certain policies.	2.20	1,408.00
Bonesteel, A.	2/05/20	Research domicile information for all Debtors' entities; review policies.	3.40	765.00
Carey, C.	2/05/20	Analyze memorandum re court interpretation of certain insurance policies.	.60	195.00
Carey, C.	2/05/20	Analyze memoranda re certain insurer policies.	.90	292.50
Carey, C.	2/05/20	Research policy provisions re certain insurer policies.	3.80	1,235.00
Carey, C.	2/05/20	Draft memorandum re insurance policy provisions research re certain insurer policies.	3.90	1,267.50
Hudson, J.	2/06/20	Communicate with A. Bonesteel, S. Martinez and K. Johnson re summarizing analysis.	.10	67.50
Martinez, S.	2/06/20	Revise and finalize policy index.	.50	112.50
Abrishami, M.	2/06/20	Analyze impact of language re certain insurer policies.	2.50	1,600.00

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Name	Date	Services	Hours	Amount
Bonesteel, A.	2/06/20	Review chart of domicile information for all Purdue entities and review policies.	.40	90.00
Carey, C.	2/06/20	Follow-up research re insurance policy provisions re certain insurer policies.	4.20	1,365.00
Carey, C.	2/06/20	Revise draft memorandum re policy provisions research re certain insurer policies.	2.40	780.00
Carey, C.	2/06/20	Communicate with J. Hudson, M. Abrishami and B. Massarsky re draft memorandum re legal research.	.30	97.50
Hudson, J.	2/07/20	Communicate with KCIC re review of directors' and officers' provisions.	.10	67.50
Abrishami, M.	2/07/20	Review memorandum re policy provisions.	.40	256.00
Massarsky, B.	2/10/20	Review research re certain insurance policies form exclusion.	.20	100.00
Hudson, J.	2/12/20	Communicate with KCIC re coding fronting policies.	.10	67.50
Hudson, J.	2/12/20	Analyze strategy for recovering insurance proceeds.	2.20	1,485.00
Wolf, D.	2/12/20	Review background factual documents re certain insurer coverage.	.20	120.00
Hudson, J.	2/14/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re research on additional coverage items.	.20	135.00
Hudson, J.	2/15/20	Review current state of insurance analysis and plan next steps.	.10	67.50
Hudson, J.	2/18/20	Direct collection and review of additional insurance-related materials.	.10	67.50
Hudson, J.	2/18/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re analysis of insurer denials and reservations of rights.	.10	67.50
Hudson, J.	2/18/20	Review research on application of expected and intended exclusion and certain language under applicable law.	.50	337.50
Hudson, J.	2/18/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re various tasks related to insurance and asset recovery.	.30	202.50
Martinez, S.	2/18/20	Review primary level policies re certain language included in policies; communicate with D. Wolf re same.	.40	90.00
Massarsky, B.	2/18/20	Confer with K. Johnson re policy correspondence list.	.30	150.00
Massarsky, B.	2/18/20	Review new insurance policy documents uploaded to Interlinks; communicate with J. Hudson re same.	.20	100.00

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Name	Date	Services	Hours	Amount
Abrishami, M.	2/18/20	Review legal memoranda related to insurance issues.	.10	64.00
Hudson, J.	2/19/20	Communicate with R. Shore and D. Wolf re potential insurance recovery strategy.	.10	67.50
Hudson, J.	2/19/20	Communicate with A. Farra and B. Massarsky re researching arbitration issues for purposes of insurance coverage analysis.	.30	202.50
Hudson, J.	2/19/20	Communicate with KCIC re updating coding of directors' and officers' program.	.10	67.50
Hudson, J.	2/19/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re notice requirements under applicable law research.	.30	202.50
Hudson, J.	2/19/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re analysis of course of conduct.	.10	67.50
Massarsky, B.	2/19/20	Confer with J. Hudson re denial letter.	.30	150.00
Massarsky, B.	2/19/20	Confer with A. Farra and J. Hudson re forum research re insurance coverage.	.50	250.00
Johnson, K.	2/19/20	Draft spreadsheet re insurer correspondence re denial letters.	1.60	360.00
Abrishami, M.	2/19/20	Analyze research re notice provisions.	.20	128.00
Farra, A.	2/19/20	Confer with J. Hudson re Debtors' insurance status update.	.50	285.00
Hudson, J.	2/20/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re research related to policy requirements under applicable law.	.20	135.00
Martinez, S.	2/20/20	Continue reviewing language included in primary level policies; draft chart re same.	1.90	427.50
Massarsky, B.	2/20/20	Review and revise Debtors' policy correspondence list.	.30	150.00
Johnson, K.	2/20/20	Draft spreadsheet re insurer correspondence re ROR and denial letters.	2.00	450.00
Abrishami, M.	2/20/20	Review notice analysis.	.20	128.00
Abrishami, M.	2/20/20	Draft summary of personal injury cases against Debtors.	.40	256.00
Hudson, J.	2/21/20	Confer with KCIC re additional policy evidence received and direct additional review.	.40	270.00
Massarsky, B.	2/21/20	Confer with KCIC and J. Hudson re status of policy review.	.40	200.00
Massarsky, B.	2/21/20	Review and revise Debtors' policy correspondence list; confer with K. Johnson re same.	.80	400.00

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Name	Date	Services	Hours	Amount
Johnson, K.	2/21/20	Confer with B. Massarsky re Debtors' spreadsheet of insurer correspondence.	.20	45.00
Sraders, S.	2/21/20	Review Purdue financial documents.	.60	228.00
Hudson, J.	2/22/20	Communicate with KCIC re analysis of policies issued to certain insureds.	.10	67.50
Johnson, K.	2/22/20	Revise spreadsheet re insurer correspondence re denial and ROR letters.	5.60	1,260.00
Hudson, J.	2/23/20	Summarize status of insurance analysis and next steps for strategy meeting.	1.00	675.00
Massarsky, B.	2/24/20	Research case law re certain insurance policy terms in New York.	1.30	650.00
Massarsky, B.	2/24/20	Review and revise Debtors' policy correspondence list; confer with K. Johnson re same.	.60	300.00
Johnson, K.	2/24/20	Confer with B. Massarsky re spreadsheet of insurer correspondence re denial and ROR letters.	.20	45.00
Johnson, K.	2/24/20	Review and analyze documents re insurance and liability.	2.40	540.00
Massarsky, B.	2/25/20	Confer with K. Johnson re content of certain insurer policy correspondence and charting same.	.30	150.00
Johnson, K.	2/25/20	Confer with B. Massarsky re spreadsheet of insurer correspondence re denial and ROR letters.	.30	67.50
Johnson, K.	2/25/20	Revise spreadsheet re insurer correspondence re denial and ROR letters.	3.80	855.00
Bonesteel, A.	2/25/20	Review insurance documents.	2.00	450.00
Lyle, R.	2/25/20	Research standards and duties; draft summary of research.	5.80	1,769.00
Martinez, S.	2/26/20	Finalize review and analysis of incoming financial and Debtors' corporate documents.	1.90	427.50
Massarsky, B.	2/26/20	Communicate with K. Johnson re content of certain insurer policy correspondence and charting same.	.30	150.00
Johnson, K.	2/26/20	Summarize analysis of documents re insurance related material.	.20	45.00
Bonesteel, A.	2/26/20	Continue to review insurance-related documents.	2.60	585.00
Sraders, S.	2/26/20	Review documents in database identified as relevant by first-level reviewers.	1.10	418.00
Sraders, S.	2/27/20	Draft summary of noteworthy documents identified during review.	.90	342.00
Quinn, K.	2/28/20	Confer with S. Sraders re documents.	.30	285.00
Hudson, J.	2/28/20	Communicate with KCIC, D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re review of additional policy evidence.	.20	135.00

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Name	Date	Services	Hours	Amount
Hudson, J.	2/28/20	Communicate with D. Wolf re applicability of atypical policy types.	.20	135.00
Grim, E.	2/28/20	Communication with J. Hudson and S. Sraders re new insurance policies provided by Debtors.	.20	120.00
Wolf, D.	2/28/20	Review EPL insurance policies.	1.60	960.00
Massarsky, B.	2/28/20	Review certain insurer policy re potential for coverage.	.10	50.00
Lyle, R.	2/28/20	Continue researching standards and duties.	3.70	1,128.50
Sraders, S.	2/28/20	Confer with K. Quinn re insurance documents.	.30	114.00
		<b>Project Total:</b>	<b>90.20</b>	<b>\$ 32,793.50</b>

#### A004: Case Administration

Name	Date	Services	Hours	Amount
Quinn, K.	2/03/20	Participate in meeting with Debtors (telephonically - partial).	2.00	1,900.00
Quinn, K.	2/21/20	Participate (telephone) in hearing.	.80	760.00
Martinez, S.	2/27/20	Research Debtors' 2007 class action and criminal case.	.90	202.50
Quinn, K.	2/28/20	Confer with E. Grim re case logistics.	.30	285.00
		<b>Project Total:</b>	<b>4.00</b>	<b>\$ 3,147.50</b>

#### A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	2/01/20	Revise / finalize December fee statement; communicate with C. Gange re same.	.40	110.00
Holland, P.	2/04/20	Revise December fee statement per Kramer Levin comments; communicate with C. Gange re same.	.60	165.00
Holland, P.	2/20/20	Draft January 2020 monthly fee statement and exhibits.	1.60	440.00
		<b>Project Total:</b>	<b>2.60</b>	<b>\$ 715.00</b>

#### A007: Emergency Relief Fund

Name	Date	Services	Hours	Amount
Quinn, K.	2/07/20	Confer with professionals re ERF strategy.	.30	285.00
Quinn, K.	2/07/20	Review Debtors' revised draft ERF proposal.	.50	475.00

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Name	Date	Services	Hours	Amount
Quinn, K.	2/09/20	Participate in ERF subcommittee call.	.80	760.00
Grim, E.	2/24/20	Review ERF proposals.	.30	180.00
Sraders, S.	2/24/20	Review current competing emergency relief fund proposals.	1.10	418.00
Grim, E.	2/26/20	Attend meeting with DOJ re ERF proposal, including preparation and follow-up.	3.00	1,800.00
Grim, E.	2/26/20	Review UCC, AHC, and NCSG ERF proposals.	1.20	720.00
Sraders, S.	2/26/20	Review proposals re emergency relief fund for February 27 meeting.	.40	152.00
Quinn, K.	2/27/20	Meet with creditors groups and Debtors re emergency fund.	4.00	3,800.00
Grim, E.	2/27/20	Meet with UCC, AHC, NCSG, and DOJ re ERF proposals.	4.00	2,400.00
Sraders, S.	2/27/20	Review emergency relief fund proposal circulated by Unsecured Creditors' Committee.	.70	266.00
Grim, E.	2/28/20	Confer with S. Sraders re follow-up from ERF meetings.	.30	180.00
Sraders, S.	2/28/20	Confer with E. Grim re conference re emergency relief fund.	.30	114.00
<b>Project Total:</b>			<b>16.90</b>	<b>\$ 11,550.00</b>

#### A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	2/02/20	Meet with AHC members re strategy.	2.00	3,000.00
Gilbert, S.	2/03/20	Meet with AHC members re strategy.	3.50	5,250.00
Farra, A.	2/03/20	Telephone call with AHC re strategy.	3.50	1,995.00
Farra, A.	2/04/20	Telephone call with non-state Ad Hoc Committee members re status update.	1.10	627.00
Quinn, K.	2/11/20	Participate in call with Diligence subcommittee re diligence status.	.50	475.00
Farra, A.	2/11/20	Telephone call with Diligence subcommittee re diligence status.	1.20	684.00
Farra, A.	2/12/20	Telephone call with Ad Hoc Committee re status.	.90	513.00
Quinn, K.	2/18/20	Confer with non-states group re open matters.	1.00	950.00
Quinn, K.	2/18/20	Participate in Diligence subcommittee call re status.	.50	475.00
Farra, A.	2/18/20	Telephone call with non-state Ad Hoc Committee members re status update; correspond with K. Quinn re same.	1.00	570.00
Gilbert, S.	2/19/20	Confer with AHC re status and strategy.	1.00	1,500.00

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Name	Date	Services	Hours	Amount
Quinn, K.	2/19/20	Participate in Committee call re strategy.	1.00	950.00
Grim, E.	2/19/20	Participate in AHC counsel weekly status call.	1.00	600.00
Quinn, K.	2/21/20	Participate in call re Diligence subcommittee re diligence status update.	1.00	950.00
<b>Project Total:</b>			<b>19.20</b>	<b>\$ 18,539.00</b>

**A015: Non-Working Travel Time (Billed @ 50%)**

Name	Date	Services	Hours	Amount
Gilbert, S.	2/02/20	Travel to New York, NY and review materials.	5.00	3,750.00
Gilbert, S.	2/06/20	Travel to Miami, FL after meetings with AHC and Debtors.	5.00	3,750.00
Quinn, K.	2/26/20	Travel to New York, NY for meeting.	4.00	1,900.00
Grim, E.	2/26/20	Travel to New York, NY for DOJ meeting re ERF.	1.50	450.00
Quinn, K.	2/27/20	Travel to Washington, DC after meeting re emergency fund.	4.00	1,900.00
Grim, E.	2/27/20	Travel to Washington, DC after ERF meetings.	2.40	720.00
<b>Project Total:</b>			<b>21.90</b>	<b>\$ 12,470.00</b>

**A019: Plan of Reorganization / Disclosure Statement**

Name	Date	Services	Hours	Amount
Gilbert, S.	2/03/20	Meet with Debtors and AHC re strategy.	5.00	7,500.00
Gilbert, S.	2/13/20	Confer with DOJ re status of negotiations.	1.50	2,250.00
Gilbert, S.	2/14/20	Confer with M. Huebner re status.	.50	750.00
Quinn, K.	2/20/20	Confer with J. Baden and D. Molton re potential TDP.	.30	285.00
Quinn, K.	2/20/20	Confer with S. Sraders and E. Grim re case background.	1.30	1,235.00
Grim, E.	2/20/20	Review background materials re Ad Hoc Committee negotiations.	.40	240.00
Grim, E.	2/20/20	Confer with K. Quinn and S. Sraders re background and current status of plan negotiations.	1.30	780.00
Sraders, S.	2/20/20	Confer with K. Quinn and E. Grim re status of ongoing proceedings.	1.30	494.00
Grim, E.	2/21/20	Analyze background of negotiations and next steps.	.50	300.00
Quinn, K.	2/24/20	Correspond with J. Conroy re TDP documents.	.10	95.00
Grim, E.	2/24/20	Review background materials re negotiations.	.40	240.00
Grim, E.	2/24/20	Confer with S. Sraders re issues relating to TDP.	.30	180.00

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Name	Date	Services	Hours	Amount
Sraders, S.	2/24/20	Confer with E. Grim re trust distribution procedures.	.30	114.00
Grim, E.	2/25/20	Review background materials and TDP models for drafting trust distribution procedures.	2.70	1,620.00
Grim, E.	2/25/20	Confer with K. Quinn re issues relating to TDP.	.50	300.00
Gilbert, S.	2/26/20	Confer with AHC re plan; confer with DOJ re status of negotiations.	2.50	3,750.00
Quinn, K.	2/26/20	Participate in meeting with DOJ and claimants.	2.50	2,375.00
Grim, E.	2/27/20	Review TDP models in preparation for drafting TDP.	.70	420.00
Johnson, K.	2/27/20	Research trust distribution procedures and settlements.	1.70	382.50
Hudson, J.	2/28/20	Confer with E. Grim and M. Abrishami re preparing for TDP discussions.	.70	472.50
Hudson, J.	2/28/20	Communicate with D. Wolf, M. Abrishami, B. Massarsky, J. Chalastori, R. Lyle and C. Carey re underlying claims for reference in plan development and asset analysis.	.50	337.50
Grim, E.	2/28/20	Confer with M. Abrishami and J. Hudson re claim valuation issues relevant to TDP.	.70	420.00
Grim, E.	2/28/20	Draft trust distribution procedures.	.30	180.00
Abrishami, M.	2/28/20	Confer with E. Grim and J. Hudson re trust distribution procedures.	.70	448.00
<b>Project Total:</b>			<b>26.70</b>	<b>\$ 25,168.50</b>
			<b>TOTAL CHARGEABLE HOURS</b>	<b>181.50</b>
			<b>TOTAL FEES</b>	<b>\$ 104,383.50</b>

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## TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	10.00	750.00	7,500.00
Gilbert, S.	16.00	1,500.00	24,000.00
Quinn, K.	8.00	475.00	3,800.00
Quinn, K.	17.20	950.00	16,340.00
Holland, P.	2.60	275.00	715.00
Hudson, J.	8.50	675.00	5,737.50
Grim, E.	3.90	300.00	1,170.00
Grim, E.	17.80	600.00	10,680.00
Wolf, D.	2.20	600.00	1,320.00
Martinez, S.	9.90	225.00	2,227.50
Massarsky, B.	8.60	500.00	4,300.00
Johnson, K.	18.00	225.00	4,050.00
Abrishami, M.	7.30	640.00	4,672.00
Bonesteel, A.	10.70	225.00	2,407.50
Lyle, R.	9.50	305.00	2,897.50
Farra, A.	8.20	570.00	4,674.00
Carey, C.	16.10	325.00	5,232.50
Sraders, S.	7.00	380.00	2,660.00
<b>TOTALS</b>	<b>181.50</b>		<b>\$ 104,383.50</b>

## TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	90.20	32,793.50
A004	Case Administration	4.00	3,147.50
A006	Employment / Fee Applications	2.60	715.00
A007	Emergency Relief Fund	16.90	11,550.00
A009	Meetings / Communications with AHC & Creditors	19.20	18,539.00
A015	Non-Working Travel Time (Billed @ 50%)	21.90	12,470.00
A019	Plan of Reorganization / Disclosure Statement	26.70	25,168.50

## EXPENSE DETAILS

### E106: Online Research

Date	Description	Task	Amount
2/28/20	Lexis	E106	20.87
2/29/20	Westlaw	E106	3,434.58
2/29/20	PACER	E106	22.70
<b>Sub-Total of Expenses:</b>			<b>\$ 3,478.15</b>

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#### **E110: Out-of-Town Travel**

Date	Description	Task	Amount
1/15/20	Travel - Lodging - Scott Gilbert / New York, NY / Attend Sackler Financial Meeting / January 14-15, 2020	E110	560.07
2/03/20	Travel - Meals - Scott Gilbert / New York NY / Attend Meetings with AHC and Debtors / 02.03.2020	E110	52.96
2/27/20	Travel - Train Fare - Kami Quinn / New York, NY / Attend Meetings re ERF / 02.26-27.2020 (Coach Fare)	E110	498.00
2/27/20	Travel - Train Fare - Emily Grim / New York NY / Attend ERF Meeting / 02/26-27/2020 (Coach Fare)	E110	498.00
2/27/20	Travel - Lodging - Kami Quinn / New York, NY / Attend Meetings re ERF / 02.26-27.2020	E110	560.07
2/27/20	Travel - Lodging - Emily Grim / New York NY / Attend ERF Meeting / 02/26-27/2020	E110	560.07
2/27/20	Travel - Taxi Fare - Kami Quinn / New York, NY / Attend Meetings re ERF / 02.26-27.2020	E110	8.17
2/27/20	Travel - Taxi Fare - Emily Grim / New York NY / Attend ERF Meeting / 02/26-27/2020	E110	16.52
2/27/20	Travel - Meals - Kami Quinn / New York, NY / Attend Meetings re ERF / 02.26-27.2020	E110	27.90
2/27/20	Travel - Meals - Emily Grim / New York NY / Attend ERF Meeting / 02/26-27/2020	E110	51.76
2/27/20	Travel - Meals - Emily Grim / New York NY / Dinner with K. Quinn and 4 Client Reps from TN and TX / Attend Meetings / 2/27/20	E110	461.34
<b>Sub-Total of Expenses:</b>			<b>\$ 3,294.86</b>

#### **E111: Meals**

Date	Description	Task	Amount
1/31/20	Business Meals - W. Millar Catering - Client Lunch Meeting: 1/31/20	E111	330.50
<b>Sub-Total of Expenses:</b>			<b>\$ 330.50</b>

#### **E118: Litigation Support Vendors**

Date	Description	Task	Amount
1/31/20	Contracted Professional Fees - Aldebaran Group - Case Support - 01.01.2020 - 01.31.2020	E118	124.02
<b>Sub-Total of Expenses:</b>			<b>\$ 124.02</b>

**TOTAL EXPENSES** \$ 7,227.53

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**EXPENSE SUMMARY**

Description	Amount
Business Meals	330.50
Travel - Train Fare	996.00
Travel - Lodging	1,680.21
Travel - Taxi Fare	24.69
Travel - Meals	593.96
Contracted Professional Fees	124.02
Lexis	20.87
Westlaw	3,434.58
PACER	22.70
<b>TOTAL FEES AND EXPENSES</b>	<b>\$ 111,611.03</b>